

SCOTT ERIK ASPHAUG, OSB #833674

United States Attorney

District of Oregon

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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 3:22-cv-00741-BR

v.

COMPLAINT IN REM
FOR FORFEITURE

**6004 NE WILDING ROAD, CITY OF
VANCOUVER, CLARK COUNTY,
STATE AND DISTRICT OF
WASHINGTON, REAL PROPERTY
WITH BUILDINGS,
APPURTENANCES, AND
IMPROVEMENTS, *in rem*,**

Defendant.

Plaintiff, United States of America, for its Complaint *in rem* for forfeiture, alleges:

I.

This Court has subject matter jurisdiction, *in rem* jurisdiction, and venue pursuant to 21 U.S.C. § 881; 28 U.S.C. §§ 1345, 1355, 1356, and 1395; and 19 U.S.C. § 1610.

II.

Defendant, *in rem*, real property commonly referred to as 6004 NE Wilding Road, Vancouver, Washington, and further described as:

The following described real estate, situated in the County of Clark, State of Washington:

Lot(s) 123, WILDING PARK ESTATES, according to the plat thereof, recorded in Volume J of Plats, Page 414, records of Clark County, Washington.

Tax ID: 119592958

(hereinafter, DEFENDANT REAL PROPERTY) is now and during the pendency of this action will be within the jurisdiction of this Court. DEFENDANT REAL PROPERTY is located in Clark County, the State of Washington, and is subject to forfeiture in the District of Oregon.

Count 1

III.

DEFENDANT REAL PROPERTY, as described above, represents proceeds traceable to sex trafficking in violation of 18 U.S.C. § 1591(a), and is therefore subject to forfeiture pursuant to 18 U.S.C. § 1594(e)(1), as more particularly set forth in the Declaration of Special Agent Scott McGeachy, Internal Revenue Service, marked as Exhibit A, attached and fully incorporated herein by this reference.

Count 2

IV.

DEFENDANT REAL PROPERTY, as described above, represents proceeds traceable to wire fraud in violation of 18 U.S.C. § 1343, and is therefore subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C), as more particularly set forth in the Declaration of Special Agent Scott McGeachy, Internal Revenue Service, marked as Exhibit A, attached and fully incorporated herein by this reference.

Count 3

V.

DEFENDANT REAL PROPERTY, as described above, represents proceeds traceable to an exchange for controlled substances or was used or intended to be used to facilitate such a transaction in violation of 21 U.S.C. § 841, and is therefore forfeitable to the United States pursuant to the provisions of 21 U.S.C. § 881(a)(6), as more particularly set forth in the Declaration of Special Agent Scott McGeachy, Internal Revenue Service, marked as Exhibit A, attached and fully incorporated herein by this reference.

Count 4

VI.

DEFENDANT REAL PROPERTY, as described above, represents property involved in money laundering in violation of 18 U.S.C. §§ 1956(a)(1)(B)(i) and 1957, and is therefore subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C), as more particularly set forth in the Declaration of Special Agent Scott McGeachy, Internal Revenue Service, marked as Exhibit A, attached and fully incorporated herein by this reference.

WHEREFORE, Plaintiff, United States of America, prays that due process issue to enforce the forfeiture of DEFENDANT REAL PROPERTY, *in rem*; that due notice be given to all interested persons to appear and show cause why forfeiture of this Defendant, *in rem*, should not be decreed; that due proceedings be had thereon; that these defendants be forfeited to the United States; that the Plaintiff United States of America be awarded its costs and disbursements incurred in this action.

DATED: May 20, 2022.

Respectfully submitted,

SCOTT ERIK ASPHAUG
United States Attorney

/s/ Katie de Villiers
KATHERINE C. DE VILLIERS
Assistant United States Attorney

VERIFICATION

I, Scott McGeachy declare, under penalty of perjury, pursuant to the provisions of 28 U.S.C. Section 1746, that I am a Special Agent with the Internal Revenue Service – Criminal Investigations, and that the foregoing Complaint *in rem* for Forfeiture is made on the basis of information officially furnished and upon the basis of such information the Complaint *in rem* for Forfeiture is true as I verily believe.

/s/ Scott McGeachy
SCOTT MCGEACHY
Special Agent
Internal Revenue Service